

Akin Gump

STRAUSS HAUER & FELD LLP

ROXANNE TIZRAVESH

+1 713.250.2249/fax: +1 713.236.0822

rtizravesh@akingump.com

August 16, 2022

Honorable George C. Hanks, Jr.
United States District Court
Southern District of Texas
515 Rusk Street, Room 6202
Houston, Texas 77002

Re: *Arnold v. Barbers Hill Independent School District*, No. 4:20-cv-01802

Joint Discovery Update

Plaintiffs and Defendant (the “Parties”) submit this Joint Discovery Update to inform the Court that, pursuant to Judge Hanks’ instructions from the August 2, 2022 discovery hearing, the Parties have met and conferred regarding the appropriate timeframe for Defendant’s production of documents that are relevant to Plaintiffs’ race discrimination claims.

At this time, Defendant has agreed to produce board minutes, memoranda, and policies related to its dress and grooming code dating back to 1964 to the extent such documents exist. Pending Plaintiffs’ review of these documents, the dispute has not yet crystallized sufficiently for Plaintiffs to file a Motion to Compel. Should this discovery dispute persist, Plaintiffs will file a Motion to Compel when the issues are fully crystallized.



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/s/ Roxanne Tizraves

Stephen Baldini*
Evan Frohman*
AKIN GUMP STRAUSS
HAUER & FELD LLP
One Bryant Park
Bank of America Tower
New York, NY 10036
Tel: (212) 872-1062
Fax: (212) 872-1002
sbaldini@akingump.com
efrohman@akingump.com

Roxanne Tizraves
Texas Bar No. 24091141
Fed. I.D. No. 2618739
Nicholas E. Petree (attorney-in-charge)
Texas Bar No. 24083657
Fed. I.D. No. 1778181
Alyx Eva
Texas Bar No. 24116334
Fed. I.D. No. 3544812
R. Conor Tomalty
Texas Bar No. 24121170
Fed. I.D. No. 3623592
AKIN GUMP STRAUSS
HAUER & FELD LLP
1111 Louisiana Street, Ste. 44
Houston, Texas 77002
Tel: (713) 220-5800
Fax: (713) 236-0822
rtizraves@akingump.com
npetree@akingump.com

/s/ Amy Demmler

Richard A. Morris
State Bar No. 14497750
Fed. I.D. 2780689
Jonathan G. Brush
State Bar No. 24045576
Fed. I.D. No. 619970
Amy Demmler
State Bar No. 24092337
Fed. I.D. No. 3227731
ROGERS, MORRIS & GROVER, L.L.P.
5718 Westheimer, Suite 1200
Houston, Texas 77057
Tel: (713) 960-6000
rmorris@rmgllp.com
jbrush@rmgllp.com
ademmler@rmgllp.com

**COUNSEL FOR BARBERS HILL
INDEPENDENT SCHOOL DISTRICT**



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aeva@akingump.com
ctomalty@akingump.com

Janai S. Nelson*
Romane Paul*
Ashley Burrell*
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
40 Rector Street, 5th Floor
New York, New York 10006
Tel: (212) 965-2200
Fax: (212) 226-7592
jnelson@naacpldf.org
rpaul@naacpldf.org
aburrell@naacpldf.org

Michaele N. Turnage Young*
Victor Jones*
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC
700 14th Street N.W., Ste. 600
Washington, D.C. 20005
Tel: (202) 682-1300
Fax: (202) 682-1312
mturnageyoung@naacpldf.org
aburrell@naacpldf.org
vjones@naacpldf.org
rpaul@naacpldf.org

**Admitted Pro Hac Vice*

**PRO BONO COUNSEL FOR
PLAINTIFFS**